

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION**

ABN AMRO Mortgage Group, Inc., )  
)  
Plaintiff, )  
)  
v. ) CASE NUMBER: 7:05-1720-RBH-WMC  
)  
SAJJ, LLC, doing business as U.S. Capital of, )  
South Carolina and U.S. Capital Funding, )  
Mark Anderson, also known as Mark D. Anderson, )  
doing business as Creative Solutions Group, ) **PROTECTIVE ORDER**  
Mark Stewart, also known as Mark A. Stewart, ) **ON CONFIDENTIAL**  
doing business as Creative Solutions Group, ) **CONSUMER INFORMATION**  
Alex J. Newton, )  
Morris Hardwick Schneider, LLC )  
H. Michael Spivey, )  
Nicholas D. Atria, )  
Vision Enterprises, Inc., )  
Next Generation, LP, )  
James Byrd, )  
Eric Byrd, )  
Charles Byrd, )  
Dionne Byrd )  
Michael Shane McMorris, also known as Michael )  
McMorris, )  
Myra Elaine McMorris, )  
Isaiah McMorris, )  
Charles L. Grogan, )  
Charles W. Grogan, )  
Eunice F. Grogan, )  
James W. Fayssoux, )  
Anderson, Fayssoux and Chasteen, Attorneys at )  
Law, P.A., )  
The Trustees and Plan Sponsor of the Anderson )  
and Fayssoux Pension and Profit Sharing Plan, )  
The Epps Company, Inc. )  
Byron B. Epps, and )  
Wilmer Raymond Ammons, )  
)  
Defendants. )  
)

This matter is before me on the motion of the Plaintiff for a Protective Order pursuant to Rule 26(c), Fed.R.Civ.P.

This litigation concerns a group of consumer mortgage loans now owned by the Plaintiff. The Plaintiff claims that a series of bad acts by the Defendants related to the origination of those mortgage loans deceived it as to the true nature of the transaction and the value of the real property offered as mortgage collateral and that those bad acts caused the Plaintiff damages. In discovery, the parties have requested information and documentation that relate to those consumer mortgage loans. Some of the information and documentation requested is confidential consumer information, including, but not limited to, loan applications, closing settlement statements, employment information and deposit information. The parties to this action wish to protect that information and that information should be protected.

Now, therefore, it is ORDERED that:

1. All documentation related to or concerning individual consumer mortgage loans produced through discovery in this matter (“Confidential Information”) shall be subject to the terms of this Order.

2. Counsel for the parties to this action shall assure that the Confidential Information is segregated in their files and made available for review only by (a) attorneys involved in this matter, their legal assistants, law clerks and other necessary staff, (b) the parties to this action, (c) experts or consultants retained in this action and (d) appropriate court personnel. The individuals allowed to review the Confidential Information described in this paragraph are hereinafter referred to as “Necessary Parties”.

3. Counsel for each party shall maintain a record of all copies made of the Confidential Information, or any part thereof, and shall assure that all copies of the Confidential Information are either returned to counsel at the termination of this action for proper disposal or filing or destroyed.

4. The Necessary Parties are prohibited from using Confidential Information for any purpose other than the prosecution or defense of the claims in the above styled matter.

5. Each of the Necessary Parties, except for Court personnel, shall sign a statement indicating that they received, reviewed and understand this Order. The statement shall be signed prior to reviewing the Confidential Information and prior to discussing the Confidential Information with any of the Necessary Parties.

6. This Order shall be made an exhibit to any deposition taken in this matter in which Confidential Information is used or referenced and the Court Reporter for such depositions shall attach a copy of this Order to the outside of the sealed original deposition. For such depositions, the Court Reporter shall also attach a copy of this Order as the first pages of any copy of the transcript of the deposition.

And it is so Ordered.

s/William M. Catoe  
United States Magistrate Judge

December 22, 2005  
Greenville, South Carolina